

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

IN RE:	)	
	)	
A&R CHAVIRA, LLC,	)	Case Number 23-30067-hcm
	)	
	)	
Debtor.	)	Chapter 11

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**WITNESS AND EXHIBIT LIST**

Following is a list of the exhibits Vehicle Acceptance Corporation may introduce and witnesses it may call at the hearing on the Motion of Vehicle Acceptance Corporation for Relief From Stay Against Property of the Estate scheduled for March 8, 2023:

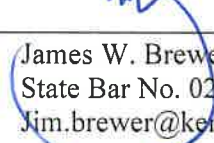
**I. WITNESSES**

1. Sara Upton  
Vehicle Acceptance Corporation  
c/o Kemp Smith LLP  
221 N. Kansas, Suite 1700  
El Paso, Texas 79901
2. Alexander Chavira  
c/o Carlos A. Miranda  
5915 Silver Springs, Bldg. 7  
El Paso, Texas 79912
3. Any witnesses designated or called by any other party and any rebuttal witnesses

**II. Exhibits**

- M-1. Floor Plan Agreement
- M-2. Demand Promissory Note and Security Agreement
- M-3. UCC-1 Financing Statement
- M-4. Inventory List of Vehicles
- M-5. Affidavit of Sara Upton
- M-6. Schedules

KEMP SMITH LLP  
P.O. Box 2800  
El Paso, Texas 79999-2800  
915.533.4424  
915.546.5360 (FAX)  
Attorneys for Vehicle Acceptance Corporation

By:   
James W. Brewer  
State Bar No. 02965200  
Jim.brewer@kempsmith.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Witness and Exhibit List and the referenced exhibits were delivered by email on March 8, 2023 to.

  
James W. Brewer